

1 THE HONORABLE JUDGE ROBERT S. LASNIK  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 S.L., by and through his parents and  
11 guardians, J.L. and L.L.,

12 Plaintiff,

13 v.

14 PREMERA BLUE CROSS; AMAZON  
15 CORPORATE LLC GROUP HEALTH  
AND WELFARE PLAN; and  
AMAZON CORPORATE LLC,

16 Defendants.

Case No.: 2:18-cv-01308-RSL

**DECLARATION OF BRODIE DYCHINCO**

I, Brodie Dychinco, state as follows:

1. I am Amazon.com's Senior Manager, Health Programs. I am of legal age, am  
competent to testify, and have personal knowledge of the matters herein.

2. In 2016, the Summary Plan Description for the Premera Standard Plan was the  
governing plan document for that component of the Amazon Corporate LLC Group Health and  
Welfare Plan (Plan). There was no separate governing Plan document.

SWORN TO under penalty of perjury under the laws of the United States of America to  
the best of my knowledge and belief.

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DECLARATION OF  
BRODIE DYCHINCO - 1

(CASE NO.: 2:18-CV-01308-RSL)

KILPATRICK TOWNSEND & STOCKTON LLP  
1420 FIFTH AVENUE, SUITE 3700  
SEATTLE, WA 98101  
(206) 626-7713 FAX: (206) 260-8946

1 DATED this 9th of day of August, 2022.  
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3 DocuSigned by:  
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DECLARATION OF  
BRODIE DYCHINCO - 2

(CASE NO.: 2:18-CV-01308-RSL)

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